

FRANCO & FRANCO  
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(RF 7749)

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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CROWN FINANCIAL SOLUTIONS, LLC.  
improperly plead as CROWN  
FINANCIAL SERVICES

PLAINTIFF,

Civil Action

Case No.: 2: 07-5153 (DMC)

vs.

NOTICE OF MOTION FOR  
SUMMARY JUDGMENT

VARGAS REALTY and  
HENRY VARGAS, individually, and  
CFA CAPITAL PARTNERS, LLC.

DEFENDANTS.

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TO: MR. HENRY VARGAS, Individually  
186-06 Powells Cove Boulevard  
Beechhurst, New York 11357

VARGAS REALTY and HENRY VARGAS, Individually  
c/o Mitchell Cantor  
Attorney at Law  
470 Park Avenue, 12<sup>th</sup> Floor  
New York, New York 10016

CFA CAPITAL PARTNERS, LLC.  
Kilstein & Kilstein, L.L.C.  
Attorneys at Law  
Attn: Richard J. Kilstein, Esq.  
River Drive Center 3  
611 River Drive, Suite 320  
Elmwood Park, New Jersey 07407

PLEASE TAKE NOTICE that the undersigned, FRANCO & FRANCO, Attorneys at Law, Robert A. Franco, Esq., appearing as attorney for the Plaintiff, Crown Financial Solutions, LLC., will apply to this Court for an Order granting Summary Judgment against the Defendants, Vargas Realty and Henry Vargas, Individually, at the Federal District Court located at the United States District Court House, District of New Jersey, Martin Luther King, Jr. Federal Building and Court House, 50 Walnut Street, Newark, New Jersey for an Order:

- (1) Granting the Plaintiff Summary Judgment against the Defendants, Vargas Realty and Henry Vargas, Individually and further;
- (2) Granting statutory interest, costs, attorney's fees and such other relief as may be appropriate.

The Plaintiff will rely on the Certifications made a part, hereof, in support to the Plaintiff's Motion attached hereto.

Date: March 19, 2012

FRANCO & FRANCO  
Attorneys for Plaintiff



Robert A. Franco, Esq.